

J-54170

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually,
and as Parents of BRETT LOVELACE,
Deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289 dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

NOTICE TO TAKE AUDIOVISUAL DISCOVERY DEPOSITION OF ROBERT MARSH

PLEASE TAKE NOTICE that the attorney for the defendant, Dr. Mark P. Clemons, will take the deposition of Robert Marsh on Monday, June 9, 2014 at 1:30 p.m. CST, in the offices of Mark Ledbetter, 254 Court Avenue, Memphis, TN 38103, upon oral examination pursuant to the Tennessee Rules of Civil Procedure before an officer duly authorized to administer oath.

The deposition shall continue from day to day until completed.

Respectfully Submitted,

LEWIS THOMASON

By: /s/ Marcy D. Magee
J. Kimbrough Johnson (7953)
Marcy D. Magee (19360)
Attorney for Dr. Mark P. Clemons
40 South Main Street, Suite 2900
Memphis, TN 38103
(901) 525-8721

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the following has been served on Mark Ledbetter, Attorney for Plaintiffs, Halliburton & Ledbetter, 254 Court Avenue, Suite 305, Memphis, TN 38103, and Jerry Potter, Bradley Gilmer and Karen Koplon, Attorneys for Defendants, Babu R. Paidipalli & Pediatric Anesthesiologists, P.A., Hardison Law Firm, 119 S. Main St., Suite 800, Memphis, TN 38103, via U.S. Mail, postage prepaid, this ____ day of May, 2014.

/s/ Marcy D. Magee
Marcy D. Magee